Patricia Trustry

STATE OF MISSOURI

Mel Carnahan, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

March 17, 2000

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Mr. Matthew Buha Environmental Officer The Norman Corporation 5900 North Broadway St. Louis, MO 63147

RE:

The Norman Corporation

Resource Recovery Certification RR0180

Classification - U

Dear Mr. Buha:

This letter is to inform you that the Missouri Department of Natural Resources' (MDNR) Hazardous Waste Program has completed a review of your renewal application for resource recovery certification. The revised application form and documents received February 24, 2000 is hereafter referred to as "the approved application." After a review of the approved application and supporting documents, the MDNR hereby certifies for hazardous waste resource recovery, The Norman Corporation in St. Louis, Missouri, to recover D001, F001, F002, F003, and F005 solvents by distillation in accordance with the following conditions:

- 1. The owner/operator shall comply with 10 CSR 25-9.020 and all plans and processes described in the approved resource recovery application.
- 2. The owner/operator shall process only those wastes listed in the approved resource recovery application and in the amounts specified.
- The owner/operator must comply with all applicable requirements of Land Disposal Restriction Regulations.
- 4. All still bottoms and sludge shall be disposed of at an authorized hazardous waste management facility.
- 5. The owner/operator shall document written contact with the St. Louis City Division of Air Pollution Control to verify compliance with all federal, state, and local regulations concerning air emissions.

00180453 RCRA RECORDS CENTER

- The owner/operator shall comply with the regulations regarding modification of the resource recovery facility given by 10 CSR 25-9.020(3)(E)(1) and the general operating requirements for all resource recovery facilities given by 10 CSR 25-9.020(3)(E). Any changes made regarding certified resource recovery activities at The Norman Corporation must be submitted to the Hazardous Waste Program in advance of the change in compliance with these regulations. The solvent separation tumblers shall not be used without prior modification of this certification.
- 7. 10 CSR 25-9.020(3)(E)(1) requires that the owner/operator shall submit a written request to the Hazardous Waste Program for approval at least 60 days prior to closure (a major modification of the certification per 10 CSR 25-9.020(3)(E)) of the resource recovery unit. A plan addressing the disposition of the unit and any associated hazardous wastes (including hazardous waste residues from decontamination of the unit) shall accompany the written notification of closure per 10 CSR 25-9.020(3)(E)(1)(A) and 10 CSR 25-9.020(3)(E)(1)(B). A copy of 10 CSR 25-9.020 is enclosed. During distillation process closure, a final rinsate sample shall be obtained inside the unit at the bottom of the unreclaimed solvent pot to confirm decontamination. The final rinse and sample shall be conducted using distilled water in an amount of either 500 milliliters or the amount of distilled water required by the laboratory for analysis of the sample, whichever is greater. The sample shall be tested for all toxicity characteristic (as defined by 40 CFR 261.24, Table 1) hazardous wastes or listed (as defined by 40 CFR 261.31, 40 CFR 261.32, or 40 CFR 261.33) hazardous wastes which were ever processed in the unit. Results of confirmatory testing shall be submitted with the written notification of closure. The results shall demonstrate that the unit has been cleaned until every hazardous waste constituent concentration is less than the corresponding laboratory practical quantitation limit (PQL) for each constituent, unless the owner/operator can show that concentrations greater than the PQL do not pose a threat to human health or the environment. The rinsate testing may be waived, upon prior approval by the MDNR, if best management practices are utilized and the resource recovery unit is to be reused or if the resource recovery unit is to be recycled as scrap. Submit all required documentation to:

Missouri Department of Natural Resources Hazardous Waste Program, Permits Section P.O. Box 176 Jefferson City, MO 65102-0176 Attention: Resource Recovery Facility Engineer

8. The owner/operator shall submit a renewal application at least 90 days before the expiration date of this certification.